

2. The SEC and Settling Defendants have agreed to full settlements of the claims against them, and to the entry of the Proposed Judgments. Copies of the Settling Defendants' Consents – in which they agree to entry of the Proposed Judgments – are attached hereto as exhibits 1 through 3.

3. The Proposed Judgments, attached hereto as Exhibits 4 through 6, eliminate the need to litigate the merits of the Settling Defendants' liability and permanently enjoin them from violations of the provisions of the federal securities laws at issue against them in the Complaint. The Proposed Judgment as to Kang also permanently enjoins Kang from participating in any decisions involving investments in securities by public pensions as a trustee, officer, employee or agent. As a result of the sentences and restitution and forfeiture orders imposed in their related criminal cases, the Settling Defendants will not be obligated to pay any funds to the SEC. Rather, their disgorgement obligations will be "deemed satisfied" by the restitution and forfeiture orders in the related criminal cases.

4. The Schonhorn and Kelley Consents contain some non-substantive errors in Paragraph 3.b. The Proposed Judgments as to Schonhorn and Kelley contain changes, in Paragraph III, that correct those errors. The SEC informed counsel for Schonhorn and Kelley of the errors in the Consents, and of the fact that the signed Consents differ slightly from the Proposed Judgments. Counsel for Schonhorn and Kelley confirmed in writing that the changes were ministerial and non-substantive, and that the corrected Proposed Judgments could be filed as drafted.

5. Entry of the Proposed Judgments will further the interests of justice and judicial economy.

WHEREFORE, for the reasons cited above, the SEC respectfully requests that the Court grant this motion and enter the Proposed Judgments.

Dated: October 24, 2019

Respectfully submitted,

/s/ Brian D. Fagel

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Commission

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CERTIFICATE OF SERVICE

I hereby certify that, on October 24, 2019, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

G. Robert Gage, Jr. Gage Spencer & Fleming LLP 410 Park Avenue New York, New York 10022 (212) 768-4900 grgage@gagespencer.com <i>Counsel for Deborah D. Kelley</i>	Samuel M. Braverman Fasulo Braverman & Di Maggio, LLP 225 Broadway, Suite 715 New York, New York 10007 (212) 566-6213 sbraverman@fbdmllaw.com <i>Counsel for Gregg Z. Schonhorn</i>
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I hereby further certify that I caused to be sent a copy of the foregoing motion to the following:

Navnoor S. Kang, Register No. 80108-065
c/o Vinewood RRC
5520 Harold Way
Los Angeles, CA 90028

s/ Brian D. Fagel
Brian D. Fagel
U.S. Securities and Exchange Commission